

# **REDACTED EXHIBIT A**

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THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH, LLC,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	2:22-CV-00422-RG-RSP
	)	
SAMSUNG ELECTRONIC CO., LTD	)	
AND SAMSUNG ELECTRONICS	)	
AMERICA, INC.,	)	
	)	
Defendants.	)	
	)	

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY  
DEPOSITION OF GREGORY RALEIGH, PH. D.  
WEDNESDAY, NOVEMBER 15, 2023  
LOS ANGELES, CALIFORNIA

REPORTED BY: JEANINE CURCIONE  
CSR NO. 10223, RPR

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1 Deposition of GREGORY RALEIGH, PH.D., taken on behalf  
2 of Defendants, at 8:59 A.M., Wednesday, November 15,  
3 2023 at 12424 Wilshire Boulevard, 12th Floor, Los  
4 Angeles, California, before Jeanine Curcione, C.S.R.  
5 No. 10223, RPR, pursuant to notice.

6

7 APPEARANCES OF COUNSEL:

8 FOR THE PLAINTIFF:

9 RUSS AUGUST & KABAT  
10 BY: MARC FENSTER, ESQ.  
11 BY: REZA MIRZAIE, ESQ.  
12 BY: JASON M. WIETHOLTER, ESQ.  
13 12424 Wilshire Boulevard  
14 12th Floor  
15 Los Angeles, California 90025  
16 Phone: (310) 826-7474  
17 e-mail: mfenster@raklaw.com

18 FOR THE DEFENDANTS:

19 FISH & RICHARDSON  
20 BY: JARED HARTZMAN, ESQ.  
21 BY: THAD C. KODISH, ESQ.  
22 1180 Peachtree Street NE  
23 Floor 21  
24 Atlanta, Georgia 30309  
25 Phone: (404) 892-5005  
e-mail: hartzman@fr.com

ALSO PRESENT:

STEFFEN LAKE, ESQ. (VIA ZOOM)

TRAVIS SIMMONS, VIDEOGRAPHER

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1	I N D E X		
2			
3	WITNESS	EXAMINATION	PAGE
4	GREGORY RALEIGH, PH. D.		
5		BY MR. HARTZMAN	6
6	* * * * *		
7	E X H I B I T S		
8	NO.	PAGE	DESCRIPTION
9	[REDACTED]		
10	[REDACTED]		
11	[REDACTED]		
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13	[REDACTED]		
14	[REDACTED]		
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1	QUESTIONS NOT ANSWERED	
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1 LOS ANGELES, CALIFORNIA;  
2 WEDNESDAY, NOVEMBER 15, 2023, 8:59 A.M.  
3

09:00:50 4 THE VIDEO OPERATOR: Good morning. Here  
09:00:51 5 begins media number 1, Volume 1, in the deposition  
09:00:55 6 of Dr. Gregory Raleigh taken in the matter of  
09:01:00 7 Headwater Research versus Samsung Electronics  
09:01:02 8 Corporation Limited. Today is November 15, 2023 and  
09:01:07 9 the time is 8:59 A.M. This deposition is being  
09:01:12 10 taken at Russ August and Kabat, 12424 Wilshire  
09:01:16 11 Boulevard, Los Angeles, California and this is made  
09:01:19 12 at the request of Fish and Richardson. I'm Travis  
09:01:21 13 Simmons, the videographer, and the court reporter  
09:01:23 14 today is Jeanine Curcione from Gregory Edwards, LLC.  
09:01:28 15 Counsel please identify yourselves and state whom  
09:01:31 16 you represent.

09:01:31 17 MR. HARTZMAN: This is Jared Hartzman from  
09:01:31 18 Fish and Richardson representing the Samsung  
09:01:36 19 defendants and with me today is my colleague Thad  
09:01:39 20 Kodish.

09:01:41 21 MR. FENSTER: Good morning. My name is  
09:01:42 22 Marc Fenster with Russ August and Kabat on behalf of  
09:01:45 23 the plaintiff Headwater and the witness. With me  
09:01:45 24 today are my partners Reza Mirzaie and Jason  
09:01:45 25 Wietholter.

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09:01:52 1 THE VIDEO OPERATOR: Thank you. The court  
09:01:53 2 reporter please administer the oath.

09:01:55 3  
09:01:55 4 GREG RALEIGH, PH. D.,  
09:01:55 5 having been duly affirmed, was  
09:01:55 6 examined and testified as follows:

09:01:55 7

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[REDACTED]

09:34:10 8 Q. Do you have any knowledge of programming  
09:34:12 9 languages?

09:34:12 10 A. Yes.

09:34:13 11 Q. Are you fluent in any?

09:34:15 12 A. Today? It was a while ago since I've  
09:34:20 13 coded. Early in my career I was a coder to do  
09:34:26 14 various things in my projects but it's been a long  
09:34:29 15 time since I worked at that level.

09:34:32 16 Q. What program languages were you fluent in?

09:34:36 17 A. Okay. Fortran, CPlusPlus, Basic, Visual  
09:34:42 18 Basic, assembly language, a little bit of work with  
09:34:48 19 Python here and there. I mean, you know, the  
09:34:54 20 programming language was never that important to me.  
09:34:57 21 It was principles of computer science that were more  
09:35:01 22 important. You know the principles of computer  
09:35:03 23 science you know how to write code you can program  
09:35:07 24 in any language.

09:35:12 25 Q. When was the last time you coded?

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09:35:15 1 A. I still code a little bit in MATLAB, which  
09:35:21 2 is another sort of language. M-A-T-L-A-B. So I  
09:35:24 3 still code a little bit in that.

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[REDACTED]

12:15:53 9 Q. I'll rephrase. By 2010 were you familiar  
12:15:58 10 with the Android operating system?

12:16:01 11 MR. FENSTER: Object to form.

12:16:02 12 THE WITNESS: You know, okay, generally  
12:16:05 13 familiar. I'm not sure what familiar means. I was  
12:16:09 14 certainly aware of Android. I knew some of the  
12:16:12 15 features. [REDACTED]

[REDACTED]



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12:26:46 14 MR. HARTZMAN: I think now is a good time  
12:26:47 15 for a break.

12:26:49 16 MR. FENSTER: Sure.

12:26:50 17 THE VIDEO OPERATOR: Off the record at  
12:26:52 18 12:25.

12:26:53 19 (At the hour of 12:25 P.M., there was a  
12:26:53 20 luncheon recess taken.)

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12:26:53 1 (At the hour of 1:07 P.M., the  
12:26:53 2 deposition was resumed.)

12:26:54 3

01:09:07 4 EXAMINATION (RESUMED)

01:09:08 5 THE VIDEO OPERATOR: We're back on the  
01:09:09 6 record at 1:07.

01:09:14 7 BY MR. HARTZMAN:

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